

**Nos. 13-20-00261-CV & 13-20-00377-CV  
(Consolidated)**

FILED IN  
13th COURT OF APPEALS  
CORPUS CHRISTI/EDINBURG, TEXAS

**In The Court Of Appeals** 12/23/2020 11:36:20 AM  
**Thirteenth District Of Texas At Corpus Christi** S. MILLS  
Clerk

CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON SUBSCRIBING TO  
POLICY NO. NAJL05000016-H87, as Subrogee of Momentum Hospitality, Inc. &  
75 and Sunny Hospitality d/b/a Fairfield Inn & Suites,  
*Plaintiff-Appellant*

v.

MAYSE & ASSOCIATES, INC. and D'AMATO CONVERSANO, INC. d/b/a  
DCI ENGINEERS,  
*Defendants-Appellees.*

**Paul B. Hines' Amended [And Unopposed] Motion for Approval of Jeffrey R.  
Learned to Participate *Pro Hac Vice* as Counsel For Plaintiff-Appellant**

TO THE HONORABLE JUDGES OF THIS COURT

NOW COMES Paul B. Hines, counsel for Plaintiff-Appellant in these matters.  
Pursuant to the Rules Governing Admission to the Bar of Texas, Rule XIX, for my  
Motion for Approval of Jeffrey R. Learned to Appear *Pro Hac Vice* on behalf of  
Plaintiff-Appellant I state as follows:

1. I am a Partner employed by Denenberg Tuffley, PLLC, located at  
28411 Northwestern Highway, Suite 600, Southfield, Michigan 48034, with a phone

number of (248) 549-3900, a fax number of (248) 593-5808, and an email address of phines@dt-law.com.

2. I am admitted to the Texas State Bar, and have been assigned bar number 24104750. I have been principal counsel for Plaintiff-Appellant in these matters, and I will continue to be associated with Jeffrey R. Learned in these matters.

3. Jeffrey R. Learned is one of my Partners at Denenberg Tuffley, PLLC. He is personally known to me, and I find him to be a reputable attorney.

4. I recommend that Jeffrey R. Learned be granted permission to appear *pro hac vice* on behalf of Plaintiff-Appellant in these consolidated appeals.

5. Pursuant to Tex. R. App. P. 10.1(a)(5), I certify that, on December 22, 2021, emails were sent to counsel for Defendants-Appellees -- Mayse & Associates, Inc. and D'Amato Conversano, Inc. d/b/a DCI Engineers -- seeking concurrence in this Motion. Via responsive emails on December 22, 2020 (from Paul Goldenberg - counsel for DCI) and December 23, 2020 (from Stanhope Denegre - counsel for Mayse), Defendants-Appellees indicated they do not oppose this Motion.

Respectfully submitted,

**Denenberg Tuffley, PLLC**

By: /s/ Paul B. Hines  
Paul B. Hines (Texas Bar No. 24104750)  
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Southfield, Michigan 48034  
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*Counsel for Plaintiff-Appellant Certain Underwriters at Lloyd's of London Subscribing To Policy No. NAJL05000016-H87, as Subrogee of Momentum Hospitality, Inc. & 75 and Sunny Hospitality d/b/a Fairfield Inn & Suites*

DATED: December 23, 2020

**CERTIFICATION OF SERVICE**

The undersigned certifies that a copy of Paul B. Hines' Amended [And Unopposed] Motion for Approval of Jeffrey R. Learned to Participate *Pro Hac Vice* as Counsel For Plaintiff-Appellant was served on the attorneys of record of all parties to the above appeal via Texas Court's e-filing system, which sends notice to counsel of record on the 23<sup>rd</sup> day of December, 2020.

/s/ Davette R. Seldon  
Davette R. Seldon

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Paul Hines  
Bar No. 24104750  
phines@dt-law.com  
Envelope ID: 49201142  
Status as of 12/23/2020 12:25 PM CST

Associated Case Party: Certain Underwriters at Lloyd's of London Subscribing to Policy No. NAJL05000016

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Evan J.Malinowski		emalinowski@dt-law.com	12/23/2020 11:36:20 AM	SENT
Michael R.Marx		mmarx@dt-law.com	12/23/2020 11:36:20 AM	SENT
Davette Seldon		dseldon@dt-law.com	12/23/2020 11:36:20 AM	SENT
Paul BHines		phines@dt-law.com	12/23/2020 11:36:20 AM	SENT

Associated Case Party: KK Builders, LLC, D'Amato Conversano, Inc d/b/a DCI Engineers, 1113 Structural Engineers, PLLC and Mayse & Associates, Inc.

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Sachi A,Dave		sdave@patellegal.com	12/23/2020 11:36:20 AM	SENT
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